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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
TIME FOR RESPONSE TO AMENDED  
THIRD-PARTY COMPLAINT AND  
COUNTERCLAIMS  
(THIRD REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Counter-Defendant (Navajo Health Foundation – Sage Memorial Hospital, Inc.), Third-Party Defendants (Christi El-Meligi and Netrishia Dalgai) and Counter-Claimant (Razaghi Development Company, LLC or "RDC") hereby stipulate to permit Counter-Defendant and Third-Party Defendants additional time, to and until October 7, 2020, to respond to the Amended Third-Party Complaint and Counterclaims asserted by RDC on September 1, 2020. *See* ECF No. 92. The parties respectfully request the Court approve this stipulation. This is the parties' third stipulation for the purpose set forth herein. In requesting the Court approve this stipulation, the parties rely upon the following:

1. Counter-Claimant RDC filed a Third-Party Complaint and Counterclaim on July 23, 2020. *See* ECF No. 67. By Order filed August 25, 2020, Counter-Defendant and Third-Party Defendants were required to file a response to those claims on September 4, 2020. ECF No. 87. However, prior to that deadline, RDC filed an Amended Third-Party Complaint and Counterclaims. This amended filing renders the September 4, 2020 deadline moot.

2. The parties have communicated regarding this matter. Paul S. Padda, Esq., counsel for Third-Party Defendants and the Counter-Defendant, has communicated the fact to opposing counsel that he has substantially completed responses to the Counterclaim and Third-Party complaint but will need 2 additional days to verify certain factual matters before filing them with the Court. Undersigned counsel for the Third-Party Defendants and the Counter-Defendant was required to travel out of town last week for an emergency business matter and during the past three days has been working on an expedited filing in a state court matter. As a result of the foregoing, he will need 2 additional days to file the responses despite having substantially completed them. Although the Court previously granted the responding parties

1 additional time, until October 5, 2020, to respond to the pending pleadings, the additional 2  
2 days requested herein will provide undersigned counsel for the responding parties sufficient  
3 time to verify certain facts with his clients and file the responses with the Court.

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5 3. The parties respectfully request the Court approve this stipulation.

6 /s/ Kris Leonhardt

/s/ Paul S. Padda

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8 Pavneet S. Uppal, Esq.  
9 Kris Leonhardt, Esq.  
10 Brian L. Bradford, Esq.

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Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.

11 *Counsel for Razaghi Development Company, LLC*

*Counsel for Christi El-Meligi,  
Netrishia Dalgai and Navajo Health  
Foundation – Sage Memorial  
Hospital, Inc.*

12 Dated: October 5, 2020

Dated: October 5, 2020

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15 **IT IS SO ORDERED:**

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18 **UNITED STATES MAGISTRATE JUDGE**

19 **DATED:** October 5, 2020  
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